

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA, )  
v. ) Case No: 2:12-cr-00005  
RONALD W. PAUL ) Judge Haynes

MOTION TO CONTINUE TRIAL DATE AND  
EXCLUDE TIME UNDER SPEEDY TRIAL

The United States, through Acting United States Attorney David Rivera and Assistant United States Attorney S. Carran Daughtry, and pursuant to Title 18, United States Code Section 3156(h)(7), moves this Court to reset the trial in this matter. The trial in this matter currently is set for Tuesday, July 16, 2013. In preparing for this trial, the government has discovered that several witnesses are unavailable for trial at that time. For example, one witness has vacation plans for that week, another has recently moved out of state, a third has a medical conflict, and another is scheduled to deliver a baby on that day. Additionally, at least one of these witnesses has been subpoenaed by the defense. Without these witnesses, the government will be unable to present its case in an effective manner. Defense counsel has no objection to this motion but requests that the trial not be reset during the week of July 22, 2013, due to prior obligations.

*This motion was granted in the interests of justice to allow government counsel to secure the attendance of necessary witnesses. Counsel has agreed to keep the government informed of any changes in trial date.*

*In all other respects, the government agrees to the continuance.*

*MSD  
8/8/13*

Wherefore, the government requests this Court grant this continuance by finding that based on the unavailability of a number of government witnesses, the ends of justice by taking such action outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3156(h)(7)(A). The government further moves, pursuant to 18 U.S.C. § 3156(h)(7)(A),